

**AFFIDAVIT IN SUPPORT OF CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Shaun Borland, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal felony and misdemeanor offenses.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since February 2022. I am currently assigned to the FBI's San Juan Division in the Violent Crimes and Major Offenders Task Force. During my time as a Special Agent, I have investigated various violations of federal law to include armed carjackings, Hobbs Act robberies, kidnappings, and assaults on federal officers.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

4. Based on my training and experience and the facts set forth below, there is probable cause to believe that Gustavo Alberto Lora Peguero violated 18 U.S.C. § 111(a) (Assaulting, Resisting, and Impeding a Federal Officer through Physical Contact) and 8 U.S.C. § 1325 (Improper Entry by an Alien).

PROBABLE CAUSE

5. On February 16, 2025, Custom and Border Protection Officers Gamalier Flores and Alexander Ortega reported to the Luis Muñoz Marín International Airport in Carolina, Puerto Rico to perform their official duties as CBP Officers. Officers Flores and Ortega were conducting Operation Cupid's Nest which involves asking all travelers in the TSA checkpoint line their flight destination and their country of citizenship.

6. The officers approached Gustavo Alberto Lora Peguero (hereinafter LORA PEGUERO) and asked him where he was going and what is his nationality was. LORA PEGUERO stated he is a Dominican National and that he did not possess a visa or resident card. Per his own statements, LORA PEGUERO entered the United States on or about December, 2024. Per CBP records, in entering the United States, LORA PEGUERO never presented himself for examination or inspection at a designated port of entry and does not possess authorization to be lawfully present in the United States.

7. After being asked to come for further examination, LORA PEGUERO began to defy officer's instructions preventing them from conducting their official duties. The officers attempted to detain LORA PEGUERO and physical altercation started. As officers attempted to put LORA PEGUERO in handcuffs while he resisted, the officers and LORA PEGUERO went to the ground and knocked over multiple lane barriers.

8. During the altercation, LORA PEGUERO bit the fingers of CBP Officer Flores' left hand. In security camera footage of the incident, you can see Officer Flores trying to pull his hand away from LORA PEGUERO but is unable to do so. After being bit, Officer Flores disengaged the subject and took out his baton. At that point, LORA PEGUERO stopped resisting and was put into handcuffs by the officers.

9. Flores went to Centro Medico Hospital where he was treated for human bites on the fingers of his left hand. He was treated by medical personnel and was discharged for self-care at home.

CONCLUSION

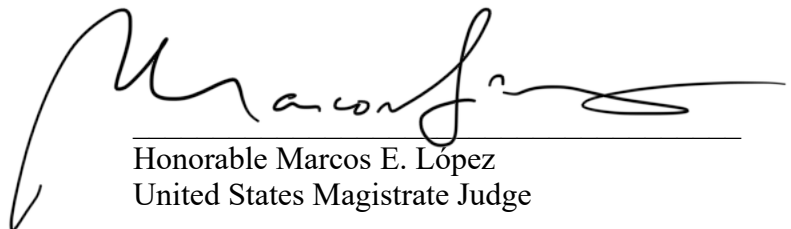
10. Based upon my training, experience, and the above facts, I respectfully submit there is sufficient probable cause to show Gustavo Alberto Lora Peguero violated 18 U.S.C. § 111(a) (Assaulting, Resisting, and Impeding a Federal Officer through Physical Contact) and 8 U.S.C. § 1325 (Improper Entry by an Alien)

Respectfully submitted,



Shaun Borland
Special Agent
FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone in San Juan, Puerto Rico, on February 16, 2025, at 4:56 PM



Honorable Marcos E. López
United States Magistrate Judge